

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
WEST VIRGINIA**

**DIANA MEY,**

**Plaintiff,**

**v.**

**CASTLE LAW GROUP, PC,  
A Tennessee Corporation;  
JUDSON PHILLIPS, ESQ.,**

**Civil Action No. 5:19-CV-185**

**An individual;  
CASTLE VENTURE GROUP, LLC,  
A Tennessee Limited Liability Company  
CASTLE EQUITY GROUP, INC.,  
A Tennessee Corporation;  
CASTLE PARTNERS, INC.,  
A Tennessee Corporation;  
CASTLE MARKETING GROUP, LLC,  
A Tennessee Limited Liability Company;  
TRISTAR CONSUMER GROUP,  
A Tennessee Corporation;  
MUSIC CITY VENTURES, INC.,  
A Tennessee Corporation;  
TRISTAR CONSUMER LAW,  
A Tennessee Corporation;  
TRISTAR CONSUMER LAW ORGANIZATION;  
A Tennessee Corporation;  
AMERICAN CONSUMER RIGHTS ORGANIZATION;  
A Tennessee Corporation;  
ADVOCUS LEGAL, INC;  
A Tennessee Corporation;  
TRISTAR CONSUMER LAW FOUNDATION,  
A Tennessee Corporation;  
CAPITAL COMPLIANCE GROUP, CO.,  
A Tennessee Corporation;  
CAPITAL COMPLIANCE GROUP, INC.,  
A Tennessee Corporation;  
CAPITAL RECOVERY LAW, PC,  
A Tennessee Corporation;  
ADVOCUS LEGAL ORGANIZATION,  
A Tennessee Corporation;  
US CONSUMER ADVOCATES,  
A Tennessee Corporation;  
THACKER AND ASSOCIATES INTERNATIONAL, LLC,  
A Foreign Limited Liability Company;  
BRUYETTE AND ASSOCIATES, LLC,  
A Florida Corporation;  
SEAN AUSTIN, an individual;  
WILLIAM MICHAEL KEEVER, an individual;**

**ASHLEY R. KEEVER, an individual;  
STEVE HUFFMAN, an individual;  
JOHN PRESTON THOMPSON, an individual;  
And JOHN DOES 1-10, corporate entities and individuals  
presently unknown,**

**Defendants.**

**DEFENDANTS CAPITAL COMPLIANCE GROUP, CO. AND JUDSON PHILLIPS'  
RESPONSE TO PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT ON  
THE RECORD**

COME NOW Defendants Capital Compliance Group, Co. and Judson Phillips and hereby adopts and incorporates by reference the reasoning set forth in *Defendants Music City Ventures, Inc., John Preston Thompson and Steve Huffman's Response to Plaintiff's Motion for Entry of Default Judgment on the Record* [Doc 268].

WHEREFORE Defendants Capital Compliance Group, Co. and Judson Phillips respectfully request that this Honorable Court deny Plaintiff's claims.

Defendants Capital Compliance  
Group, Co and Judson Phillips,  
by counsel,

/s/ Paul J. Harris  
Paul J. Harris  
W.Va. Bar # 4673  
32 Fifteenth Street  
Wheeling, WV 26003  
304.232.5300

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
WEST VIRGINIA**

**DIANA MEY,**

**Plaintiff,**

**v.**

**CASTLE LAW GROUP, PC,  
A Tennessee Corporation;  
JUDSON PHILLIPS, ESQ.,**

**Civil Action No. 5:19-CV-185**

**An individual;  
CASTLE VENTURE GROUP, LLC,  
A Tennessee Limited Liability Company  
CASTLE EQUITY GROUP, INC.,  
A Tennessee Corporation;  
CASTLE PARTNERS, INC.,  
A Tennessee Corporation;  
CASTLE MARKETING GROUP, LLC,  
A Tennessee Limited Liability Company;  
TRISTAR CONSUMER GROUP,  
A Tennessee Corporation;  
MUSIC CITY VENTURES, INC.,  
A Tennessee Corporation;  
TRISTAR CONSUMER LAW,  
A Tennessee Corporation;  
TRISTAR CONSUMER LAW ORGANIZATION;  
A Tennessee Corporation;  
AMERICAN CONSUMER RIGHTS ORGANIZATION;  
A Tennessee Corporation;  
ADVOCUS LEGAL, INC;  
A Tennessee Corporation;  
TRISTAR CONSUMER LAW FOUNDATION,  
A Tennessee Corporation;  
CAPITAL COMPLIANCE GROUP, CO.,  
A Tennessee Corporation;  
CAPITAL COMPLIANCE GROUP, INC.,  
A Tennessee Corporation;  
CAPITAL RECOVERY LAW, PC,  
A Tennessee Corporation;  
ADVOCUS LEGAL ORGANIZATION,  
A Tennessee Corporation;  
US CONSUMER ADVOCATES,  
A Tennessee Corporation;  
THACKER AND ASSOCIATES INTERNATIONAL, LLC,**

**A Foreign Limited Liability Company;  
BRUYETTE AND ASSOCIATES, LLC,  
A Florida Corporation;  
SEAN AUSTIN, an individual;  
WILLIAM MICHAEL KEEVER, an individual;  
ASHLEY R. KEEVER, an individual;  
STEVE HUFFMAN, an individual;  
JOHN PRESTON THOMPSON, an individual;  
And JOHN DOES 1-10, corporate entities and individuals  
presently unknown,**

**Defendants.**

**CERTIFICATE OF SERVICE**

I hereby certify this *Defendants Capital Compliance Group Co. and Judson Phillips' Response To Plaintiff's Motion For Entry Of Default Judgment On The Record* was filed via the Court's electronic CM/ECF filing system this 12th day of May, 2022, which will then send notification of such filing to the following:

John W. Barrett, Esq.  
Jonathan R. Marshall, Esq.  
Sharon F. Iskra, Esq.<sup>[L]</sup><sub>[SEP]</sub>  
Bailey & Glasser, LLP  
209 Capitol Street  
Charleston, WV 25301

/s/ Paul J. Harris  
Paul J. Harris